

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
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This Document relates to:

Burnett, et al. v. Islamic Republic of Iran, et al., No. 15-cv-9903 (GBD)(SN)

NOTICE OF MOTION TO CORRECT

PLEASE TAKE NOTICE that Plaintiffs in the above-captioned matter who are represented by Motley Rice LLC and in accordance with Fed. R. Civ. P. 60(a) and the inherent powers of this Court, respectfully request that this Court grant Plaintiffs' Motion to Correct Exhibit A (ECF No. 9735-1 (ECF No. 702-1 in 15-cv-9903)) to the April 30, 2024 Declaration of John M. Eubanks, and Exhibit A (ECF No. 9736-2 (ECF No. 703-2 in 15-cv-9903)) to the April 30, 2024 Proposed Order to correct an error related to the citizenship of one of the decedents. In the past 24 hours, undersigned counsel received a copy of the United States passport of Manuel John Damota issued on August 12, 1997. Plaintiffs are filing a new motion for default judgment on behalf of Barbara E. Damota, as Personal Representative of the Estate of Manuel John DaMota, this evening under 28 U.S.C. § 1605A(c) rather than as a non-U.S. national under state law. Therefore, Plaintiffs request that the Court strike the claim for Barbara E. Damota, as Personal Representative of the Estate of Manuel John DaMota, from Plaintiffs' April 30, 2024 motion (ECF No. 9733 (ECF No. 700 in 15-cv-9903)) and permit this claim to proceed in the forthcoming *Burnett XXXII* motion that is being filed this evening. The adverse parties to the pending motion, the Islamic Republic of Iran, the Islamic Revolutionary Guard Corps, and the Central Bank of the Islamic Republic of Iran, have not appeared in this proceeding, and the Clerk issued Certificates of Default on December 5, 2016. ECF No. 67 in 15-cv-9903.

Dated: June 21, 2024

Respectfully submitted,

MOTLEY RICE LLC

/s/ John M. Eubanks

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